

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

February 1, 1983

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U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-327/82-31 AND 50-328/82-31 - RESPONSE TO VIOLATION

The subject OIE inspection report dated December 29, 1982 from
D. M. Verrelli to H. G. Parris cited TVA with one Severity Level IV
Violation.

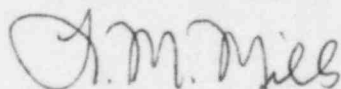
Enclosed is our response to the subject inspection report.

If you have any questions, please get in touch with R. H. Shell at
FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Licensing

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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ENCLOSURE

RESPONSE - NRC INSPECTION REPORT NOS.
50-327/82-31 AND 50-328/82-31
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED DECEMBER 29, 1982

Appendix A (327, 328/82-31-01)

10 CFR 19.12, 20.102 and 20.202 respectively require that prior to permitting an individual to work in a restricted area or enter an area where the individual is likely to receive in excess of 25 percent of the applicable quarterly dose, the licensee shall properly inform the individual of the applicable radiological information, determine the individual's prior occupational dose and supply appropriate personnel monitoring equipment. These requirements are implemented by the licensee's Radiological Control Instructions RCI-2 "Radiological Hygiene Training" and RCI-3 "Personnel Monitoring."

Contrary to the above, an individual entered a restricted area without proper training, determination of prior dose, or personnel monitoring equipment in that on November 25, 1982 a Field Services Group electrician entered the Unit 1 containment with a work crew without receiving the training, prior dose determination, or personal dosimetry required by RCI-2 and 3. The licensee estimated the worker's dose during the period based on the dose received by other personnel in the area and it was well within regulatory limits.

This is a Severity Level IV Violation (Supplement I). This violation applies to both Units 1 and 2.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

A management team investigated the incident. The team concluded that if existing plant procedures had been followed, the violation would not have occurred. The individual involved was required to undergo the proper training and prior dose determination and ensure he had a dosimeter before he entered a regulated area. Line management has the responsibility for verifying that employees issued cardkeys have dosimetry prior to entering a regulated area. These requirements were not followed which resulted in the violation. The management team also concluded that routine training and retraining as well as specific training

on procedure changes should have contained more detailed information on Radiological Control Instructions (RCIs) and Physical Security Instructions.

3. Corrective Steps Which Have Been Taken and the Results Achieved

Upon realizing that the worker's badge had not been properly signed by the escort and that he did not have dosimetry, the badge was signed and a radiological incident report was filed by a Health Physics technician. The worker had been given a whole body analysis on November 24 and was given another on November 26, 1982. This analysis indicated no significant internal deposition of radionuclides. His estimated external exposure was approximately 2 millirem based on dosimetry of coworkers that he was with at all times in containment. This is well within regulatory limits. The worker received Health Physics training on November 26 to ensure that he would be familiar with plant procedures for entering regulated areas.

A training program was held on November 29 and 30 with all Field Services Group (FSG) foremen to ensure that each one knows his responsibility for security escort. Also, FSG personnel were notified of their escort responsibilities during crew safety meetings.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

- a. All plant personnel who can sign cardkey requests will be reminded of the significance of their signature. They will be instructed not to sign a request for access to a regulated area by a person not assigned dosimetry. This will be completed by February 15, 1983.
- b. Health Physics training and retraining will be reviewed to ensure that the appropriate detailed information in RCIs is covered by General Employee Training. Routine safety meetings or special training will emphasize detailed RCI information. This review will be completed by April 15, 1983.
- c. Appropriate disciplinary action will be taken for those responsible for procedure violations.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved December 1, 1982.